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March 25, 1999

To: File

Thru: Joe Helfrich, Permit Supervisor, Compliance

From: Peter Hess, Reclamation Specialist III PH

RE: Mine Sequence Change, Co-Op Mining Company, Bear Canyon #2 Mine, ACT/015/025-99A, Folder #2, Emery County, Utah

SUMMARY:

A reduction in seam height in the North end of the Tank seam has resulted in a mining projection change for same. Due to economic conditions created by potential quality problems, Co-Op has found the need to set the minimum minable seam height at 5.5 feet. Projections have thus been changed to reflect this minimum minable seam height.

Also, a ground water monitoring well which had been forecast to be implemented in the extreme North end of the 1st North Mains (SDH-1A) cannot be installed, due to the Mains development being cut short by approximately 850 feet, (again due to reduced seam thickness).

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING PLANS AND PROJECTIONS

Regulatory Reference: R645-300-142., -301-510., -511.100, -512.110, -521.110

Analysis:

Conducting Mining Activities According to Approved Application
Introduction; Design of Mining Activities
Proposed Coal Mining Operations
P. E. Certification/Mine Workings to the Extent Known
Previously Mined Areas

An unpredicted reduction in seam height in the Tank seam, (Bear Canyon #2 Mine) has resulted in a need to change the mining projections; a change in recoverable reserves is obvious. Federal coal lease U-024316 is involved.

The applicant has seen fit to establish the minimum minable seam height at 5.5 feet, more than likely due to machinery height considerations. The brushing of floor or roof in order to gain sufficient height to operate is not an option, as the ash generated would destroy coal quality, in turn causing potential cancellation of contracts.

The last modification to the Tank seam mining projections was made through ACT/015/025-97I. This current application makes changes in the following areas of the #2 Mine:

1) Approximately 2,600 feet of three entry bleeder development running NNE off of the North bleeder is being proposed **not to be developed.**

2) Approximately 850 feet of seven entry development in 1st North Mains will **not be developed due to the reduced seam height.** A ground water monitoring well that had been proposed earlier will not be implemented.

3) A four entry development only section (protection zone for the Bear Creek and Castle Gate outcrop) will be developed as far as coal seam thickness allows. According to Mr. Steve Falk of the USBLM, PFO, the applicant intends on using this section to cross the Bear Canyon fault into the Mohrland coal property. CO-OP has made a bearing change of a degree or so to bring this section more to the NNE, i.e., closer to the fault.

4) The sequence change proposal also shows the additional development of pillars on both the North and South sides of the North bleeder where same intersects 1st North.

These changes are notable on the revised Plate 3-4C, as compared to the Plate 3-4C submitted with ACT/015/025-97I. This map is P.E. certified by Mr. Charles Reynolds.

As noted above, Mr. Steve Falk, Mining Engineer with the USBLM was contacted and that agency appears to be aware of the projection changes in the Tank seam and the potential loss of recoverable reserves.

Findings:

The purpose of this proposed sequence to the mining process within the Tank seam is to keep the mining and reclamation plan current with the coal mining operations as they are influenced by changing geologic factors. The permittee is re-designing the underground workings to make the extraction process more lucrative to the economic processes. This submittal adequately addresses the requirements of R645-300-142, 301-510, 301-511.100, 512.110, and 521.110.

With regard to the engineering requirements of the R645 rules, ACT/015/025-99A should be approved as submitted.

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